

# **EXHIBIT P**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ANDREY KOSTIN,  
a/k/a "Andrei Kostin,"

VADIM WOLFSON,  
a/k/a "Vadim Belyaev," and

GANNON BOND,

Defendants.

S2 24 Cr. 91 (GHW)

**Declaration of  
Roland E. Chattaway**

ROLAND E. CHATTAWAY, pursuant to Title 28, United States Code, Section 1746, declares the following under penalty of perjury:

1. I, Roland E. Chattaway, submit this declaration under penalty of perjury.
2. I am a Special Agent with the Federal Bureau of Investigation ("FBI"). I participated in the investigation of this case.
3. I was present at defendant Vadim Wolfson's February 22, 2024 arrest in Austin, Texas.
4. At the time of Wolfson's arrest, I believed that asking Wolfson about his phone passcode was a permissible, non-substantive area of inquiry that did not require *Mirandizing* him, akin to asking about his pedigree information, such as his name or date of birth.
5. I now understand that my belief at the time was incorrect. I deeply regret this error.
6. Aside from the brief, limited passcode discussion, I did not ask Wolfson any substantive questions about the charges against him nor about the investigation under which he was being arrested. This reflected my sincerely held but, as I now know,

mistaken belief at the time that asking about Wolfson's phone passcode was a permissible, non-substantive area of inquiry that did not require *Mirandizing* a defendant.

7. At the time of Wolfson's arrest, I did not understand that one sentence in the 25-page agent affidavit in support of the search warrant, of which I was not the affiant, stated "This authority is not to compel WOLFSON to provide a numeric passcode." The search warrant itself, as opposed to the agent affidavit, did not contain this single sentence.

Dated: December 23, 2024  
Washington, D.C.

Roland E. Chattaway  
Roland E. Chattaway  
Special Agent  
Federal Bureau of Investigation